

EXHIBIT C

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HIGHLY CONFIDENTIAL

December 8, 2023

By Hand Delivery

Mr. Scott McKinney
Superintendent
Delaware Valley Regional High School
19 Senator Stout Road
Frenchtown, NJ 08825

Re. **CEASE AND DESIST**

[REDACTED] Delaware Valley High School Board of Ed. et als.
Our File No. 01195

Dear Mr. McKinney,

This firm has been retained to represent the interests of [REDACTED] and his minor daughter, [REDACTED]. We have been advised the Delaware Valley Regional High School District ("District") has been taking affirmative actions to socially transition [REDACTED], a child who is diagnosed with Asperger's Syndrome, including facilitating her use of a male identity at school without parental notice or consent. Moreover, we understand that the District has been actively concealing such actions from [REDACTED]. **Demand hereby is made that the District and all of its employees and agents immediately cease and desist from undertaking any and all such activity.**

Mr. [REDACTED] contends that the District's actions violate, without limitation, the fundamental right of parents to care for and raise their children, as set forth by the United States Supreme Court in *Troxel v. Granville*, 530 U.S. 57 (2000). As such, the District has and continues to violate Mr. [REDACTED] rights under the Fourteenth Amendment of the United States Constitution. Mr. [REDACTED]

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Mr. Scott McKinney, Superintendent
Delaware Valley Regional High School District

December 8, 2023
Page 2

further contends, without limitation, that the District's acts violate 20 U.S.C. §3401(3), which provides: "parents have the primary responsibility for the education of their children, and States, localities, and private institutions have the primary responsibility for supporting that parental role." Thus, to the extent the District contends that state law or policy compels the District to act in the manner in which it has toward [REDACTED], the Supremacy Clause of the United States Constitution (Art. VI, Cl. 2) provides otherwise. Moreover, Mr. [REDACTED] contends that the District's actions otherwise violate the New Jersey Constitution and laws, and public policy and laws of the United States and of New Jersey.

We look forward to your immediate confirmation that the District and all those acting under it will comport with this demand, and that all records of the District correctly reflect that Avery is the child's name, and that she is a female.

Please be guided accordingly.

Very truly yours,

MURRAY-NOLAN BERUTTI LLC

By: 

Ronald A. Berutti

RAB/rp